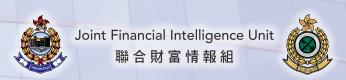


聯合財富情報組年報 Joint Financial Intelligence Unit Annual Report

ng of Terrorism·可疑交易舉報·Suspicious Transaction Reporting.可题 和外展·Training and Outreach·打擊清洗黑錢·Anti-Money Laund Dicious Transaction Reporting · 可疑交易報告管理系統 · STREAMS Dutreach·打擊清洗黑錢·Anti-Money Laundering·反恐籌資·Com n Reporting · 可疑交易報告管理系統 · STREAMS · 國 先黑錢·Anti-Money Laundering。反恐籌資·Combating the Fi 告管理系統·STREAMS·國際合作·International Cooperation 恐籌資·Combating the Financing of Terrorism·可疑交易學報 - International Cooperation·培訓和外展 · Training and Outrea of Terrorism · 可疑交易舉報 · Suspicious Transaction Repor 展·Training and Outreach·打擊清洗黑錢·Anti-Mone us Transaction Reporting . 可疑交易報告管理系 each·打擊清洗黑錢·Anti-Money Laundering·反恐籌 可疑交易報告管理系統·STREAMS·國際合作·International Coop ng·皮恐籌資· Combating the Financing of Terrorism



JOINT FINANCIAL INTELLIGENCE UNIT, HONG KONG

As a law-enforcement-type financial intelligence unit (FIU),
the Joint Financial Intelligence Unit (JFIU) is co-staffed by
officers of the Hong Kong Police Force (HKPF) and
the Hong Kong Customs and Excise Department (C&ED).
It is the sole agency in Hong Kong to receive, analyze and disseminate
Suspicious Transaction Reports (STRs), and
facilitate financial intelligence exchange with FIUs worldwide.

打擊清洗黑錢·Anti-Mor香港聯合財富情報組 聯合財富情報組是執法型的財富情報單位, 由香港警務處及香港海關的人員組成。 聯合財富情報組專門接收、分析及發布可疑交易報告, Cooperation·培訓和文並負責與各地的財富情報單位交換金融情報, 是本港唯一肩負此等職能的機構。 Money Laundering · 反恐籌資 · Combating the Financing of Terrorism 疑交易舉報·Suspicious Transaction Reporting·可疑交易 系統·STREAMS·國際合作·International Cooperation 訓和外展·Training and Outreach·打擊清洗黑錢·Anti-Money Lau · 反恐籌資· Combating the Financing of Terrorism · 可 Suspicious Transaction Reporting 🗐 🙀 STREAMS·國際合依·International Cooperation·培訓和 Combating the Financing of Terrorism · 可疑交易學報 · Suspicious Trans Reporting · 可疑交易報告管理系統 · STREAMS · 國際合作 · Internation Cooperation·培训和外展· Training and Outreach·打擊清洗黑

VISION AND MISSION

VISION

That the JFIU remains one of the leading FIUs in the Asia-Pacific Region

MISSION

That the JFIU continues to assist the Government in her efforts to protect Hong Kong from illicit activities of money laundering and terrorist financing by:

- Juxtaposing the JFIU's professional standards with relevant international standards
- Fostering and strengthening cooperation with local and international agencies in the exchange of financial intelligence
- Intelligently analyzing suspicious transaction reports received by the JFIU and making disseminations as appropriate
- Upgrading relevant sectors' awareness and understanding of money laundering and terrorist financing issues

抱負及使命

抱負

保持聯合財富情報組在亞太區內其中一個主要的財富情報單位的 領先地位

And Ashard China

使命

聯合財富情報組致力協助政府保護香港免受清洗黑錢及恐怖分子 融資等非法活動的影響,方法包括:

- 致使聯合財富情報組的專業標準與相關的國際標準接軌
- 在交換財富情報方面與本地及國際機構加強合作
- 對接收的可疑交易報告進行精細分析並且適時發布
- 加強相關業界對清洗黑錢及恐怖分子融資問題的意識及了解

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聯合財富情報組 主管序言 Message from the Head of JFIU



打擊清洗黑錢·Anti-Money Laundering
· 反恐籌資·Combating the Financing of
Terrorism·可疑交易舉報·Suspicious
Transaction Reporting·可疑交易報告管理
系統·STREAMS·國際合作·International
Cooperation·培訓和外展·Training and
Outreach·打擊清洗黑錢·Anti-Money
Laundering·反恐籌資·Combating the
Financing of Terrorism·可疑交易舉報·
Suspicious Transaction Reporting·可疑交
易報告管理系統·STREAMS·國際合作·

2015年對國際間打擊清洗黑錢/反恐籌資的伙伴而言,依舊挑戰重重。跨國清洗黑錢活動頻繁,其中商業電郵詐騙在多個地區的情況尤為嚴重。為此,各地執法機關、財富情報單位及其他主要持份者均盡己所能,彼此協作,交換財富情報並落實措施遏止此類罪行,以免禍延大眾。近來,世界各地發生連串恐怖襲擊,促使二十國集團領導人號召打擊清洗黑錢財務行動特別組織(特別組織)及其司法管轄區成員並肩作戰,聯手應付恐怖分子籌資的威脅。

香港作為國際金融中心,並為特別組織及亞洲/太平洋反清洗黑錢組織(亞太反洗錢組織)成員,一直努力確保在政策及策略、法律及規管架構、執法及財富情報交流,以至國際、地區及區域層面合作方面,均緊貼全球變化,與特別組織的標準看齊。本組矢志維護香港的金融體系,鼓勵以合規遵從的模式採取打擊清洗黑錢/反恐籌資措施,並與各界緊密合作,包括決策局、監管機構及專業團體、執法機關、金融機構,以及指定的非金融企業及行業。

在 2015 年,本組所接收的可疑交易報告數目,以及與各地財富情報單位交換情報的次數,均創出新高,分別有 42,555 宗報告及 1,974 次情報往來。工作日益繁重,而有關持份者的期望,同樣與日俱增;為此,本組定期覆檢分析財富情報的流程,以提升效率,力求完善。與此同時,本組會繼續監察可疑交易報告及與財富情報單位所交換的情報的質素及數量,務求所發放的情報更具價值。

特別組織將於 2018 年對香港進行相互評核。為此,本組已在策略及實務層面展開籌備工作,同時密切留意其他特別組織及亞太反洗錢組織司法管轄區成員最新的相互評核經驗。本組並派出財富情報單位/執法機關專家進行相互評核,以掌握第一手實務知識。快將來臨的相互評核標準嚴謹,極具挑戰,本組會與本地主要的打擊清洗黑錢/反恐籌資伙伴同心協力,向世界展現香港全面而有效的打擊清洗黑錢/反恐籌資制度。

我們作為香港的財富情報單位,定必緊守崗位,保持專業水準,在打擊清洗黑錢/ 反恐籌資的路上勇闖難關。



The year of 2015 was another challenging year for the international Anti-Money Laundering/ Combating the Financing of Terrorism (AML/CFT) community. Transnational money laundering activities, particularly those related to business email compromise, remained prevalent in many jurisdictions. As such, law enforcement agencies (LEAs), FIUs and other key stakeholders have been working closely with one another to exchange financial intelligence and implement measures with a view to stopping this crime and reducing victimization. The series of recent terrorist attacks worldwide have urged G20 Leaders to call on the Financial Action Task Force on Money Laundering (FATF) and its member jurisdictions to refocus on joint actions to combat terrorist financing threats.

As an international financial centre and a member of the FATF and Asia/ Pacific Group on Money Laundering (APG), Hong Kong is dedicated to implementing the evolving FATF standards in terms of policies and strategies, legal and regulatory framework, law enforcement and financial intelligence exchange, as well as cooperation at international, regional and territorial levels. The JFIU continues to help safeguard the integrity of the financial system in Hong Kong through advocacy of pro-compliance approach in adopting AML/CFT measures and close-knit collaboration with policy bureaux, regulatory and professional bodies, LEAs, financial institutions (FIs) and designated non-financial businesses and professions (DNFBPs).

In 2015, both the number of STRs from reporting entities and international financial intelligence exchanges with FIUs reached new high at 42,555 reports and 1,974 correspondences respectively. In face of increasing workload and growing expectation from stakeholders, the JFIU spares no effort in enhancing efficiency to meet greater demands by regularly reviewing and streamlining the workflow of financial intelligence analysis. At the same time, the JFIU will continue to oversee the quality and quantity of STRs and FIUs' information exchanged, with a view to ensuring the disseminated intelligence are of value to our worldwide counterparts.

As the FATF Mutual Evaluation (ME) on Hong Kong in 2018 is drawing close, the JFIU has already commenced its preparation at both strategic and operational levels by keeping in view the latest ME experiences of other FATF and APG member jurisdictions, and acquiring first-hand practical knowledge by sending FIU/LEA expert to conduct ME assessment. The JFIU will work hand in hand with key local AML/CFT players to meet the highly vigorous and challenging assessment criteria of this round of ME so as to demonstrate the robustness and effectiveness of Hong Kong's AML/CFT regime.

We as the FIU in Hong Kong endeavour to maintain our professional work and overcome more and more AML/CFT challenges ahead.



OUR MILESTONES

打擊清洗黑錢 / 反恐籌資的領域發展迅速,多年以來,聯合財富情報組一直蜕

The JFIU has been evolving with the tremendous development of the AML/ CFT

《有組織及嚴重罪行條例》 (第 455 章)

於 1994 年公布,涵蓋本港可公訴 罪行及世界各地類似犯罪行為的得 益,同時擴闊本組接收可疑交易報 告的範疇。

Promulgated in 1994, the Organized and Serious Crimes Ordinance (OSCO, Cap. 455) extends the money laundering offence to cover the proceeds of indictable offences in Hong Kong and similar conduct worldwide, and at the same time broadens the scope of STRs received by the JFIU.

香港分別於 1991 和 1997 年加入 特別組織和亞太反洗錢組織,成為 司法管轄區成員;其後,本組多次 派出代表出席全體會議,務求掌握 最新的國際標準與特別組織的建議

Since Hong Kong joined the FATF and the APG as a member jurisdiction in 1991 and 1997 respectively, the JFIU representatives have been attending their plenary meetings with a view to seeking alignment with the most upto-date international standards and FATF Recommendations.

■ 與國際標準接軌

Alignment with International Standards

聯合財富情報組向來努力求進,確保香港在打擊 清洗黑錢及反恐籌資方面緊貼全球趨勢,與國際 標準接軌。

The JFIU strives for improvement in performance through keeping pace with the global or regional efforts in the fight against money laundering and terrorist financing activities.

🔷 本地法例 Local Legislation

香港就打擊清洗黑錢 / 反恐籌資訂立以下四條法例,充分發揮聯合財富情報組的獨特職能 — 以接收可疑交易報告作為主要的財富情報來源。

The four pieces of AML/CFT legislation in Hong Kong have leveraged the unique function of the JFIU – receiving STRs as the main source of financial intelligence.

《聯合國(反恐怖主義措施)條例》 (第 575 章)

於 2002 年頒布,本組開始接收有關恐怖分子財產的可疑交易報告。

Introduced since 2002, the **United Nations** (Anti-Terrorism Measures) **Ordinance** (UNATMO, Cap. 575) further empowers the JFIU to receive STRs related to terrorist property.

1996 1997

2002

2012

自 1996 年,本組作為埃格蒙特組織成員,藉着集團的安全網絡,致力就清洗黑錢及恐怖分子籌資活動,與世界各地的財富情報單位交換金融情報。本組又參與埃格蒙特組織會議及訓練,提升處理財富情報的整體能力,精益求精。

As a member of the Egmont Group of Financial Intelligence Units (Egmont Group) since 1996, the JFIU takes advantage of its secure network to exchange financial information on money laundering and terrorist financing activities with FIU counterparts worldwide. The JFIU also participates in the Egmont Group's meetings and training sessions to enhance its overall financial intelligence capability.

《打擊洗錢及恐怖分子資金籌集 (金融機構)條例》 (第 615 章)

於 2012 年實施,就客戶盡職審查 和備存記錄等範疇訂立條文,間接 提升金融界對打擊清洗黑錢及反恐 籌資的意識,從而向本組舉報更多 可疑交易。

Implemented since 2012, the Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) Ordinance (AMLO, Cap. 615) codifies the requirements of customer due diligence and record keeping, indirectly increasing AML/CFT awareness and thus the number of STR filings from the financial sectors.

本組架構 OUR STRUCTURE

聯合財富情報組在 1989 年成立,隸屬香港警務處毒品調查科的財富調查組。 2010 年,本組增加人手,從財富調查組獨立分支運作,並於警察總部內重置辦事處。至今,本組編制約有 50 人,人員來自香港警務處及香港海關,主管是一名警司,並分「聯合財富情報組 1」及「聯合財富情報組 2」兩隊,由兩名任職總督察的副主管帶領。

「聯合財富情報組1」由四支情報分析及發展小隊組成,專責拓展、分析和發布 財富情報,並就清洗黑錢或恐怖分子籌資的案件類型進行研究。

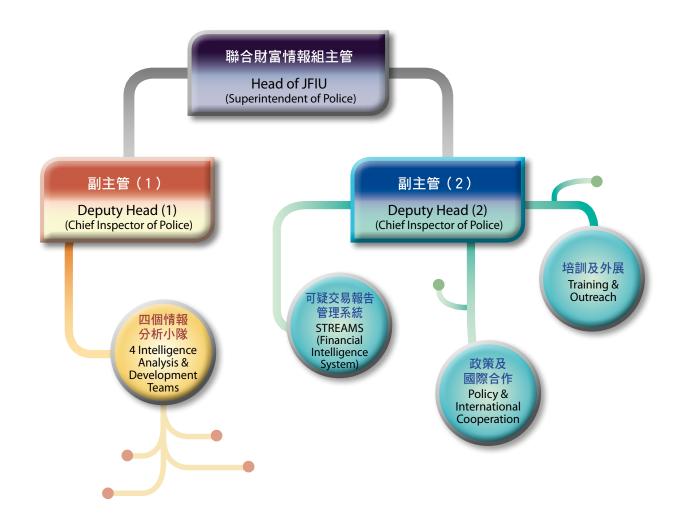
「聯合財富情報組2」由三支政策及支援小隊組成。其中一隊管理可疑交易報告管理系統(即 STREAMS,以電子方式呈報和處理可疑交易報告,並連結至其他情報資料庫的網絡平台)。另一隊制訂政策、促進國際合作和與其他財富情報單位交換情報。餘下一隊則籌辦財富調查訓練予本地以至世界各地的執法機關和其他合作伙伴,以及向金融機構和指定的非金融企業及行業進行外展宣傳。

Established in 1989, the JFIU was formed under the Financial Investigation Division (FID) within the Narcotics Bureau (NB) of HKPF. In 2010, the JFIU expanded in strength to operate independently (disintegrated from FID), and relocated its office within the Headquarters of HKPF. To date, the JFIU has an establishment of approximately 50 staff members from both the HKPF and the C&ED, headed by a Superintendent of Police. The JFIU is divided into two sections, JFIU 1 and JFIU 2, each commanded by a Deputy Head at the rank of Chief Inspector of Police.

JFIU 1 comprises four intelligence analysis and development teams that are responsible for cultivation, examination and dissemination of financial intelligence, and research on money laundering or terrorist financing case typologies.

JFIU 2 consists of three policy and support teams. One team manages the Suspicious Transaction Report and Management System (STREAMS, a web-based platform facilitating the e-reporting/ processing of STRs and interfacing with other intelligence databases). Another team assists to formulate policies, promotes international cooperation and exchanges intelligence with FIU counterparts. The remaining team coordinates financial investigation training for local and worldwide LEAs and other counterparts, and conducts publicity outreach to FIs and DNFBPs.

聯合財富情報組架構 ORGANIZATIONAL CHART



相關持份者 OUR STAKEHOLDERS

聯合財富情報組與一眾持份者緊密合作,確保舉報可疑交易/交換財富情報的流程完備穩妥,並為打擊清洗黑錢/反恐籌資制度力臻完善。本組日常工作伙伴包括香港特別行政區的政策局(即財經事務及庫務局和保安局禁毒處)、風險評估小組、金融監管機構及專業團體(如香港金融管理局和證券及期貨事務監察委員會)、私營界別(如金融機構和指定的非金融企業及行業),以及亞太區以至世界各地的財富情報單位及執法機關。

The JFIU works closely with various stakeholders to maintain the integrity of the STR/ financial intelligence exchange workflow, and enhance the robustness of Hong Kong's AML/ CFT regime. The day-to-day working partners include Hong Kong Special Administrative Region's policy bureaux, i.e. the Financial Services and the Treasury Bureau (FSTB) and the Narcotics Division of the Security Bureau (ND, SB), risk assessment unit, financial regulators and professional bodies, including the Hong Kong Monetary Authority and the Securities and Futures Commission of Hong Kong, and private sectors like Fls and DNFBPs, FlUs and LEAs in the Asia Pacific Region and around the world.



可疑交易舉報 Suspicious Transaction Reporting



可疑交易舉報機制 SUSPICIOUS TRANSACTION REPORTING REGIME

根據《販毒(追討得益)條例》(第405章)及《有組織及嚴重罪行條例》(第455章)第25A條,以及《聯合國(反恐怖主義措施)條例》(第575章)第12條,凡任何人知道或懷疑任何財產是或代表犯罪得益或恐怖分子財產,必須提交可疑交易報告,把該知悉或懷疑向獲授權人(即聯合財富情報組人員)披露。

本組根據或憑藉可疑交易報告所得的資料,可向律政司、香港警務處、香港海關、 入境事務處及廉政公署披露,或披露予本組認為合適的在香港以外任何地方負責 防止或調查罪案/恐怖主義行為,或處理可疑交易報告的主管當局或人員,而發 布資料的目的,必須為打擊罪案或調查/防止恐怖主義行為。

Under section 25A of DTROPO (Cap. 405) and OSCO (Cap. 455), as well as section 12 of UNATMO (Cap. 575) of the Laws of Hong Kong, any person, who knows or suspects any property is or represents proceeds of crime or terrorist property, has to report his/ her knowledge or suspicion to an authorized officer (i.e. JFIU officer) by way of an STR.

Information obtained under or by virtue of an STR may be disclosed by the JFIU to the Department of Justice, the HKPF, the C&ED, the Immigration Department, and the Independent Commission Against Corruption (ICAC); or to the authorities or persons responsible for crime/ terrorism-related prevention/ investigation or handling the STR, of any place outside Hong Kong which the JFIU thinks fit. The dissemination of such information is solely for the purpose of combating crime or investigating/ preventing terrorist acts.



在香港,基於知悉或懷疑向聯合財富情報組舉報可疑交易,是所有人士的法律責任,並不僅限於金融機構和指定的非金融企業及行業。至於向其他團體發布可疑交易報告的資料,同樣受法律限制。恪守保密原則對確保可疑交易舉報機制健全可靠至為重要。

可疑交易舉報機制是本組在財富情報領域盡展所能的基石。舉報機制的整體效率 高低,有賴於接收、分析和發布可疑交易報告的工作流程。本組冀望呈報機構能 鼎力支持本組工作,並繼續提交高質素的可疑交易報告。

The knowledge or suspicion-based filing of STR(s) to the JFIU is a legal obligation applied to everybody, not limited to FIs and DNFBPs, in Hong Kong. The dissemination of STR information to other parties is also legally bound. Confidentiality is strictly safeguarded to maintain the integrity of the suspicious transaction reporting regime.

The suspicious transaction reporting regime forms the cornerstone of financial intelligence capability of the JFIU. Its overall effectiveness relies on the workflow of receipt, analysis and dissemination of STRs. The JFIU looks forward to quality input and continuous support from reporting entities.



可疑交易報告趨勢 STR SUBMISSION TREND

歷年可疑交易報告及發布宗數 STR Filings and Dissemination per Annum

2015 年,聯合財富情報組接獲和發布的可疑交易報告宗數,均創下記錄新高 — 在 42,555 宗可疑交易報告中,近四分之一 (10,454 宗) 獲發布予執法機關及財富情報單位。

在 2011 至 2015 年間,各界提交的可疑交易報告宗數由 20,287 宗倍增至 42,555 宗。繼《打擊洗錢及恐怖分子資金籌集(金融機構)條例》在 2012 年實施後,金融機構和指定的非金融企業及行業對懷疑清洗黑錢或恐怖份子籌資活動的意識有所提高,規管措施亦更趨嚴謹。因此,本組預期可疑交易報告宗數會在未來持續增長。

獲發布的可疑交易報告宗數自 2011 年起由 3,921 宗增至 2015 年的 10,454 宗。至於每年的可疑交易報告發布比率 (即發布的可疑交易報告宗數 / 接獲的可疑交易報告宗數),則介乎 20% 至 25%。本組與呈報機構保持聯繫,務求提升可疑交易報告資料的整體質素,並就可疑交易報告進行深入分析,及積極向有關的機構發放財富情報,以便採取行動。

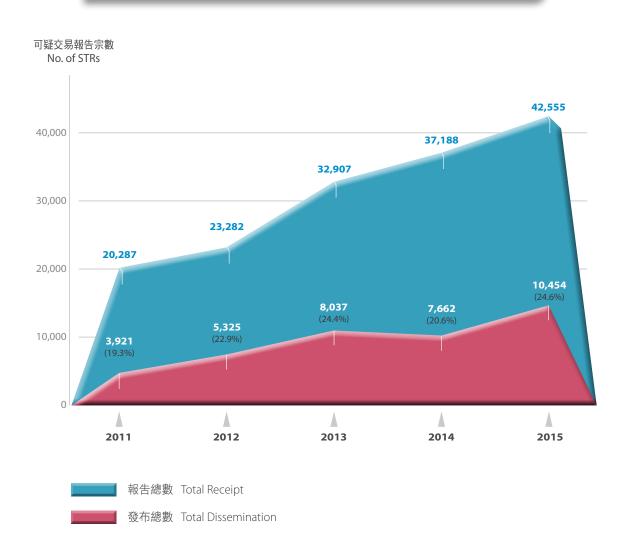


Both the annual number of STRs received and disseminated by the JFIU hit a record high in 2015 – among the 42,555 STRs filed to the JFIU, nearly a quarter of them (10,454 STRs) were disseminated to LEAs and FIUs.

Between 2011 and 2015, the number of STR filings surged from 20,287 to 42,555. In anticipation, the rise of STRs will continue because of the heightened awareness and tightened control measures against suspicious money laundering or terrorist financing activities among FIs and DNFBPs pursuant to the enactment of AMLO in 2012.

The number of disseminated STRs has experienced an increase from 3,921 in 2011 to 10,454 in 2015. The annual STR dissemination rate (i.e. number of STRs disseminated/ number of STRs received) ranged between 20% and 25%. The JFIU maintains dialogues with reporting entities with a view to boosting the overall quality of STR input, conducting in-depth STR analyses, and proactively disseminating financial intelligence to appropriate agencies for action.

2011 - 2015 年本組接獲及發布的可疑交易報告宗數 Number of STRs Received and Disseminated between 2011 and 2015

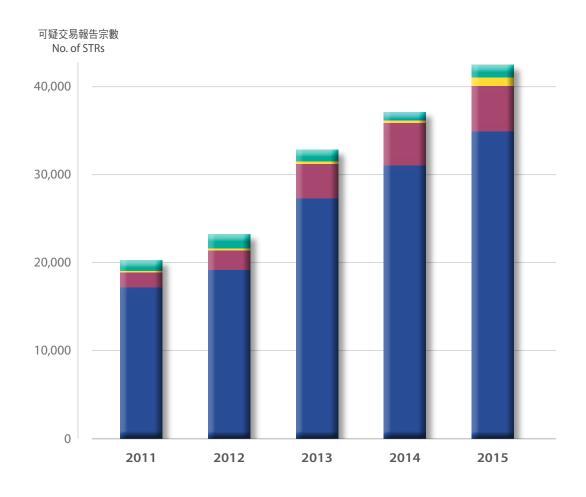


各個界別提交的可疑交易報告宗數 STR Filings by Sectors

過去五年,逾90%可疑交易報告由金融機構提交;來自指定的非金融企業及行業的可疑交易報告則佔最多約3%;而其他界別提交的報告佔總數最多約8%。當中,銀行界為最主要舉報者,佔可疑交易報告總數超過80%。

In the past five years, the FIs accounted for over 90% of the annual total STR submissions, the DNFBPs for about 3% and other sectors for about 8%. The banking sector was the main contributor in the volume of STRs filed, making up more than 80% of the overall submissions.

2011-2015 年本組接獲的可疑交易報告宗數(按界別劃分) Number of STRs Received (By Sector) between 2011 and 2015



本組在過去五年接獲的可疑交易報告數字及所佔比率,按呈報行業界別劃分,表列如下。

The yearly breakdown of STRs received by category of reporting sectors (and the respective %) in the past five years is tabulated below.

行業 Sector	2011	2012	2013	2014	2015			
金融機構 Fls								
銀行	17,194	19,202	27,328	31,095	34,959			
Banks	(84.75%)	(82.48%)	(83.05%)	(83.61%)	(82.15%)			
金錢服務經營者	1,051	1,171	2,108	2,772	3,566			
MSOs	(5.18%)	(5.03%)	(6.41%)	(7.45%)	(8.38%)			
證券公司	470	698	1,410	1,574	1,095			
Securities Firms	(2.32%)	(3.00%)	(4.29%)	(4.23%)	(2.57%)			
保險公司	204	341	401	446	495			
Insurance Companies	(1.00%)	(1.46%)	(1.22%)	(1.20%)	(1.16%)			
放債人	1	31	28	32	33			
Money Lenders	(<0.01%)	(0.13%)	(0.09%)	(0.09%)	(0.08%)			
指定的非金融企業及行業 DNFBPs								
律師行	116	110	235	222	894			
Legal Firms	(0.57%)	(0.47%)	(0.72%)	(0.60%)	(2.10%)			
信託及公司服務供應商 Trust & Company Service Providers (TCSPs)	32 (0.16%)	49 (0.21%)	27 (0.08%)	46 (0.12%)	22 (0.05%)			
地產代理	2	28	12	29	31			
Real Estate Agents	(0.01%)	(0.12%)	(0.04%)	(0.08%)	(0.07%)			
貴重貨品交易商	1	16	26	18	6			
Dealers in Precious Products	(<0.01%)	(0.07%)	(0.08%)	(0.05%)	(0.02%)			
會計師行	10	4	4	3	6			
Accounting Firms	(0.05%)	(0.02%)	(0.01%)	(0.01%)	(0.02%)			
其他 Others	1,206	1,632	1,328	951	1,448			
	(5.94%)	(7.01%)	(4.01%)	(2.56%)	(3.40%)			
總計 Total	20,287 (+ 3%)	23,282 (+ 14.8%)	32,907 (+ 41.3%)	37,188 (+ 13%)	42,555 (+ 14.4%)			

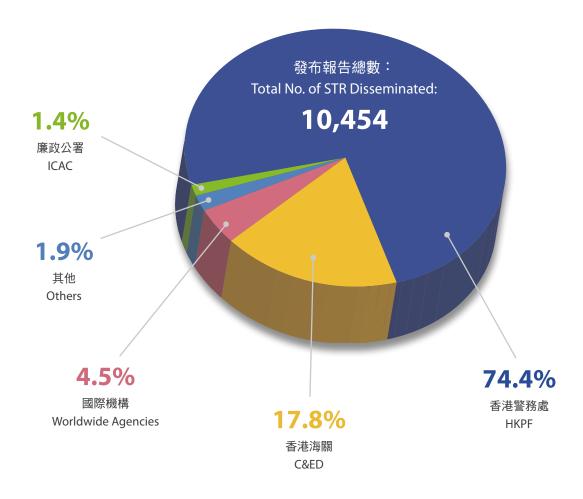
2015 年,金融機構中的銀行、金錢服務經營者及證券公司續為舉報可疑交易最多的三個行業。儘管指定的非金融企業及行業提交的報告所佔比例不大,但由於法律界積極舉報可疑交易,該界別由 2011 年的 116 宗躍升七倍至 2015 年的 894 宗。

In 2015, banks, money service operators (MSOs) and securities companies from FIs remained the top three STR contributors. Despite the relatively low proportion of STR filings from DNFBPs, a seven-fold escalation from 116 in 2011 to 894 in 2015 was noted as a result of the keen involvement of the legal sector.

2015 年可疑交易報告發布情況 STR DISSEMINATION IN 2015

聯合財富情報組透過發布可疑交易報告,致力提供有用情報,以便本地及海外執法機關進行調查,或供其他財富情報單位進一步拓展情報。2015年,本組發布的可疑交易報告共計10,454宗,對象主要是香港警務處(74.4%)、香港海關(17.8%)及國際機構(4.5%)。

Through dissemination of STRs, the JFIU seeks to provide useful leads for local and overseas LEAs to pursue investigation or for FIU counterparts to further cultivate financial intelligence. In 2015, the HKPF (74.4%), the C&ED (17.8%) and worldwide agencies (4.5%) were the major recipients of a total of 10,454 STRs disseminated by the JFIU.



可疑交易報告管理系統 STREAMS

電子報告 e-STR Submissions

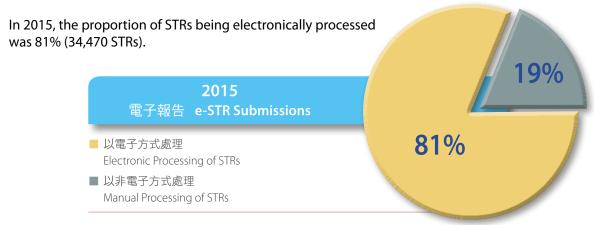
自2006年起,本組採用可疑交易報告管理系統 (STREAMS)接收、分析和貯存所有可疑交易報告。呈報機構只要安裝軟件程式 S-BOXII及配合電子證書,便可透過 STREAMS 以電子方式向本組提交可疑交易報告,以及獲取回應。

STREAMS 是安全保密的網絡平台,提供廿四小時持續無間的數據傳輸服務,既能提高可疑交易報告工作流程的效率,又可確保適時向呈報機構作出回應。舉報可疑交易省時便捷,歡迎各呈報機構多用 STREAMS 提交報告,詳情請見 www.jfiu.gov.hk。

2015年,以電子方式處理的可疑交易報告比例為81%(34,470宗)。

The JFIU has been using STREAMS (Suspicious Transaction Report and Management System) for receiving, analyzing and storing all STRs since 2006. Coupled with the installation of a software application "S-BOX II" and "e-Cert", reporting entities can file STRs to the JFIU and obtain feedback electronically via STREAMS.

STREAMS is a secure web-based platform for round-the-clock data transmission that improves the efficiency of the STR workflow and ensures the timeliness of feedback to the reporting entities. The JFIU welcomes more reporting entities to enjoy hassle-free convenience that STREAMS provides. Details are available on www.jfiu. gov.hk.



系統優化計劃 Enhancement Project

STREAMS 已經完成優化工程,多項系統功能均有所改善,並於 2016 年正式推出使用,以配合情報分析及實務工作與日俱增的需求,以及不同調查小組的運作需要。

To meet the evolving needs of intelligence analysis and support operational needs of investigation units, STREAMS has been upgraded with enhanced features and officially implemented since 2016.

案例及類型學 Case Examples and Typologies



香港的打擊清洗黑錢法例容許以清洗黑錢作為獨立控罪起訴犯人,而控方無須證 明處理的財產代表從可公訴罪行的得益。

適時收集及分析金融情報,有助提升財富調查效能並取得成果。在本港的打擊清 洗黑錢/反恐籌資制度中,呈報機構能提交高質素的可疑交易報告,以及本組與 世界各地財富情報單位交換金融情報,實在至關重要。各界群策群力,打擊犯罪 集團首腦跨國清洗黑錢活動,並把其繩之於法。

至於在本港法庭上審理複雜的清洗黑錢案,法證會計師報告能説明錯綜複雜的可疑交易,協助證明有關罪行。

若懷疑清洗黑錢人士已經潛逃,或不能在港逮捕的情況下,其在港的犯罪得益,仍可予以限制或沒收。因此,透過財富調查追蹤和追討資產,有助遏止非法清洗 黑錢活動在港進行。

The AML laws in Hong Kong allow standalone money laundering charge(s) against criminal(s) without the necessity of proving that the property being dealt with represents the proceeds of an indictable offence.

Timely financial intelligence and analysis could yield good financial investigation outcomes. Filing of good quality STRs to the JFIU and exchange of financial information between the JFIU and worldwide FIUs are crucial elements in the AML/CFT regime to maintain the momentum of enforcement actions against masterminds of criminal syndicates and their transnational money laundering activities.

In complex money laundering cases, forensic accountant reports also play a significant part in securing the conviction of money laundering involving intricate suspicious transactions at courts in Hong Kong.

Crime proceeds routed to Hong Kong could still be restrained or confiscated even if the suspected money launderers have absconded or could not be arrested in Hong Kong. Asset tracing and recovery as a result of financial investigations help deter illicit money laundering activities in Hong Kong.

本章載述五個案例,從中可見香港警務處及香港海關打擊清洗黑錢活動不遺餘力,在各層面深入調查販毒及其他罪案,並追蹤和沒收犯罪得益,以偵破不同犯案手法的案件。

The five case examples in this Chapter reiterate the commitment of the HKPF and the C&ED to combat money laundering activities involving various modus operandi through conducting in-depth investigations into drug trafficking or other crimes at all levels and by way of tracing and confiscating proceeds of crime.



案例 Case

清洗非法層壓式推銷活動的得益 Laundering the Proceeds of Illegal Pyramid Selling Activities

香港警務處毒品調查科財富調查組接獲機密情報,於是就 A 太太進行財富調查。 A 太太的丈夫 A 先生自 2011 年被判「組織和管理非法層壓式推銷活動」罪成, 在 P 國服刑。

調查顯示,A 先生於 2007 年在香港成立 W 公司,以開設公司銀行戶口,而夫婦二人是該戶口的獲授權簽署人。進一步追查下,得悉二人及 W 公司在本港多間銀行開設了逾 30 個戶口。2008 至 2011 年間,這些戶口錄得多筆存款,合共 6.09 億港元,包括現金及第三者轉帳;其後,逾 4.67 億港元分別被轉往不知名人士,以及購買投資基金、保險產品及房地產。

2012年,A 太太在其本港一個公司戶口申請一張總額 2.02 億港元的銀行本票,最終在前往本地銀行分行提取該筆款項時被捕。2015年,A 太太被判 14 項清洗黑錢罪名成立,在港判處監禁 4年9個月。因此,A 太太持有的 3,600 萬港元的犯罪得益被充公,而 A 先生及 W 公司的 2.13 億港元資產則被凍結以待日後充公。

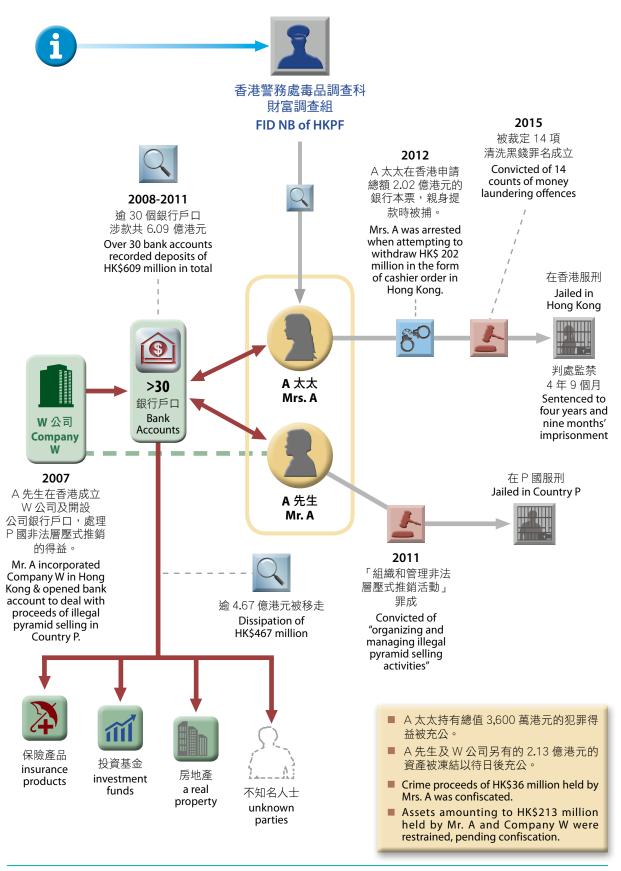
A piece of confidential intelligence prompted the FID NB of HKPF to initiate a financial investigation against Mrs. A, whose husband Mr. A was convicted of "organizing and managing illegal pyramid selling activities" and has been serving sentence in jail in Country P since 2011.

The investigation revealed that Mr. A had incorporated Company W in Hong Kong in 2007 for opening a corporate bank account, of which the couple were authorized signatories. Further enquiries showed that over 30 accounts were opened in the name of the couple and Company W in various banks in Hong Kong. Between 2008 and 2011, these accounts recorded numerous deposits of HK\$609 million in total, including cash and transfers from third parties, and subsequent dissipation of over HK\$467 million to unknown parties and for purchase of investment funds, insurance products and a real property.

In 2012, Mrs. A applied for a cashier order totaling HK\$202 million from a corporate bank account in Hong Kong. She was eventually arrested when she attended a local bank with a view to withdrawing the same amount. In 2015, Mrs. A was convicted of 14 counts of money laundering offences and sentenced to four years and nine months' imprisonment in Hong Kong. As a result, crime proceeds of HK\$36 million held by Mrs. A was confiscated and a total of HK\$213 million worth assets held by Mr. A and Company W were restrained pending confiscation.

清洗非法層壓式推銷活動的得益 Laundering the Proceeds of Illegal Pyramid Selling Activities

案例 Case



案例 Case

一 以購買物業清洗黑錢

Money Laundering through the Purchase of Real Property

香港警務處毒品調查科財富調查組根據線報,就一名中年男子B先生展開財富調查。B先生的父母為Q國的政治人物。在2010年兩個月內,有16人(其中一人為金錢服務經營者)曾向B先生在香港的個人戶口存入37筆現金/轉帳/支票存款,涉款逾2,400萬港元。他隨即在港購買一所豪宅,沒有使用按揭借款。他在香港並無任何合法業務或入息申報足以讓他購入單位,資金的主要來源不明。

在香港進行調查期間,B先生及其父在Q國被判賄賂罪成,涉款1,500萬港元,分別處以監禁10年及死緩。縱然有關犯罪得益已被Q國沒收,毒品調查科財富調查組仍能申請限制令,以限制B先生在香港的銀行戶口存款結餘及有關房產,最後於2015年被香港特別行政區政府沒收共500萬港元。

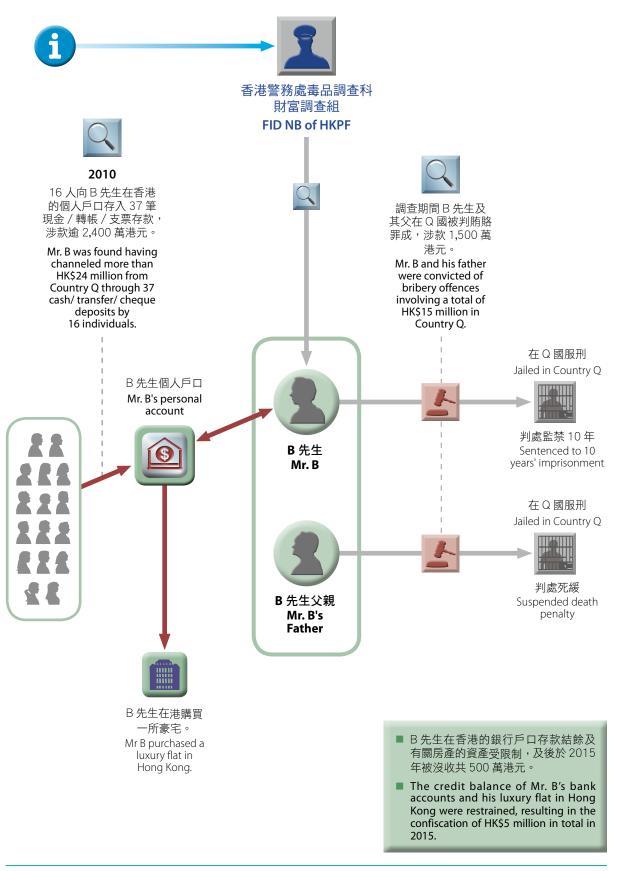
Acting upon information, the FID NB of HKPF conducted financial investigation against a middle-aged man Mr. B, whose parents were politically exposed persons in Country Q. Within two months in 2010, Mr. B was found having channeled more than HK\$24 million from Country Q through 37 cash/ transfer/ cheque deposits by 16 individuals including an MSO into his personal account in Hong Kong. He soon purchased a luxury flat in Hong Kong without any mortgage facility. He had neither any legitimate business nor reported income in Hong Kong to substantiate the purchase, and the majority of sources of funds remained unknown.

In the course of investigation in Hong Kong, Mr. B and his father were convicted of bribery offences involving a total of HK\$15 million in Country Q, and sentenced to 10 years' imprisonment and suspended death penalty respectively. In addition to the crime proceeds being confiscated in Country Q, the credit balance of Mr. B's bank accounts and his luxury flat in Hong Kong were subsequently restrained under a Restraint Order, resulting in the confiscation of HK\$5 million in total to the Hong Kong Special Administrative Region Government in 2015 by the FID NB of HKPF.

以購買物業清洗黑錢

案例 Case

Money Laundering through the Purchase of Real Property



案例 Case 5

清洗綁架(在香港境外發生)的贖金 Laundering the Ransom of Kidnapping (Occurred outside Hong Kong)

警隊接獲線報得悉受害人在R國被綁架,其兄弟之後按犯人要求,把250萬港元贖金匯到香港兩個銀行戶口。其中一個戶口為R國C先生所有,另一戶口則由Y公司持有。Y公司透過秘書公司在香港成立,C先生是唯一的董事及股東。

毒品調查科財富調查組的調查顯示, C 先生在受害人被綁架前數月曾來港三次, 目的只為設立 Y 公司和開設兩個銀行戶口。此外, C 先生及其 Y 公司在香港未曾提交報税表, 沒有申報合法收入來源, 亦無真正業務可以證明兩個銀行戶口的存款來源。

資金流向分析確定, C 先生戶口內的 100 萬港元存款結餘為綁架案的部分贖金, 而其餘 150 萬港元,本存於 Y 公司的戶口,則在較早前透過轉帳移去,下落未明。雖然執法人員奮力尋找受害人及其兄弟,可惜不果。儘管疑犯 C 先生已經潛逃,其個人戶口內的 100 萬港元存款結餘已根據潛逃者法律程序於 2015 年在香港被沒收。

The HKPF received information that a victim was kidnapped in Country R and his brother subsequently remitted a ransom of HK\$2.5 million in total to two bank accounts in Hong Kong upon request by the criminals. One account was held by Mr. C from Country R, and the other was held by Company Y, which was incorporated in Hong Kong through a secretarial company with Mr. C as the sole director and shareholder.

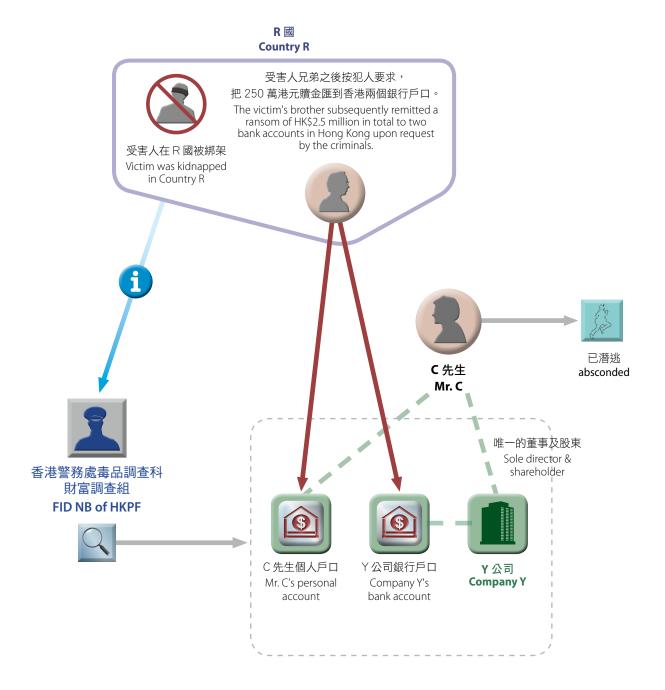
The investigation by the FID NB revealed that Mr. C came to Hong Kong on three occasions solely for the purpose of setting up Company Y and opening two bank accounts a few months before the kidnapping took place; and Mr. C and his Company Y had never filed any tax return in Hong Kong, with neither legitimate source of reported income nor genuine business to validate the deposit of funds in both bank accounts.

The fund flow analysis confirmed that the HK\$1 million in Mr. C's account was a partial ransom of the kidnapping case; the remaining HK\$1.5 million in Company Y's account has already been dissipated by transfer and the whereabouts of the funds remained unknown. Effort has been made to locate the victim and his brother but in vain. As Mr. C has absconded, the aforesaid account balance of HK\$1 million in his personal account was confiscated by way of absconder proceedings in Hong Kong in 2015.

清洗綁架(在香港境外發生)的贖金

Case

Laundering the Ransom of Kidnapping (Occurred outside Hong Kong)



- C 先生個人戶口的 100 萬港元存款 結餘已根據潛逃者法律程序於 2015 年在香港被沒收。
- Account balance of HK\$1 million in Mr. C's personal account was confiscated by way of absconder proceedings in Hong Kong in 2015.



犯罪得益流向

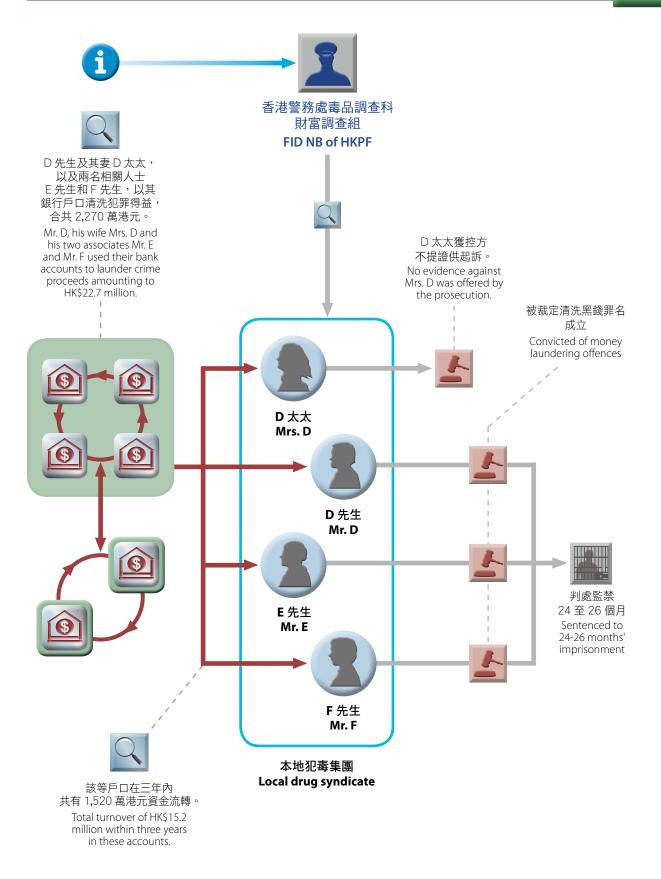
案例 Case

一 本地販毒集團清洗黑錢 Money Laundering by Local Drug Syndicate

機密情報顯示,本地一個販毒集團首腦 D 先生及其妻 D 太太,以及兩名相關人士 E 先生和 F 先生,以其銀行戶口清洗犯罪得益,合共 2,270 萬港元。香港警務處 的財富調查披露,D 先生及 D 太太在本港三間銀行開設了四個個人儲蓄戶口,該 等戶口在三年內共有 1,520 萬港元資金流轉,與他們的經濟背景並不相稱。資金 流向分析顯示,每當戶口存入數筆款項,在同日或不久之後,便有金額相若的款 項被提走或轉帳,或經 D 先生、D 太太、E 先生和 F 先生數人的戶口進行跨行轉帳。 D 先生、E 先生和 F 先生分別就清洗黑錢罪名被裁定罪成,判處監禁 24至 26 個月,至於 D 太太,控方最終答應不提證供起訴。

Confidential intelligence revealed that a local drug syndicate head Mr. D, his wife Mrs. D and his two associates Mr. E and Mr. F had used their bank accounts to launder crime proceeds amounting to HK\$22.7 million. Financial investigation by the HKPF revealed that Mr. and Mrs. D had opened four personal savings accounts with three banks in Hong Kong, of which the total turnover of HK\$15.2 million within three years was incommensurate with their known financial background. Fund flow analysis showed that whenever there were multiple deposits in any of these accounts, a lump sum of cash withdrawal or transfer would be made on the same day or shortly thereafter by way of inter-bank transfer among the accounts of Mr. and Mrs. D, Mr. E and Mr. F. Mr. D, Mr. E and Mr. F were convicted of money laundering offences and respectively sentenced to 24-26 months' imprisonment, while the prosecution agreed to offer no evidence against Mrs. D.

本地販毒集團清洗黑錢 Money Laundering by Local Drug Syndicate



案例 Case 5

一 製毒男子及其家人清洗黑錢

Money Laundering by Drug Manufacturer and his Family Members

數年前,香港海關成功搗破一個製冰毒工場及毒品儲存中心,共拘捕五名人士, 並檢獲 70 公斤冰毒、70 公升液體冰毒及 200 公升半製成液體冰毒,總值約 1.75 億港元。

經財富調查後,香港海關發現該毒品集團主腦 G 先生利用兩名兒子的四個銀行帳戶於一年內清洗超過 1,000 萬港元的販毒得益。四個戶口的交易十分頻繁,且存入款項會於短時間內以現金提走或轉帳至其他帳戶,帳戶交易活動和頻密次數與兩名兒子的收入及背景明顯不相符。

2012年,經審訊後兩名兒子被裁定串謀清洗黑錢罪名成立,分別被判監 63 個月及 10 個月。2014年,集團主腦 G 先生亦被裁定販運危險藥物罪名成立,被判監 14 年 3 個月。2013年及 2014年,G 先生及其兩名兒子所操控總值 120 萬港元的資產被沒收。

A few years ago, the C&ED successfully smashed a sophisticated methamphetamine manufacturing and storage centre with five persons arrested. About 70kg of methamphetamine, 70 litres of liquidized methamphetamine and 200 litres of semi-processed liquidized methamphetamine worth about HK\$175 million were seized.

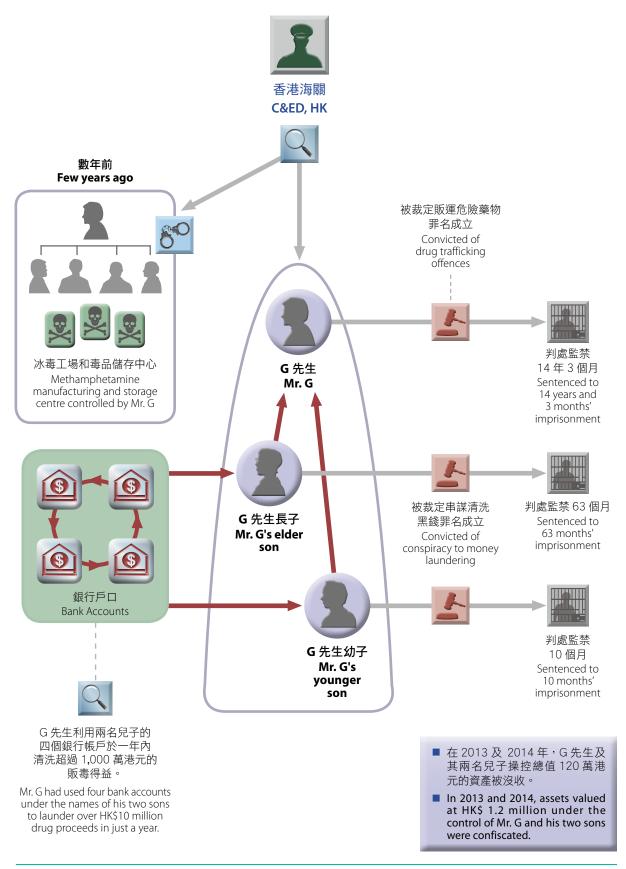
Upon financial investigation, the C&ED discovered that the mastermind of the drug syndicate, Mr. G, had used four bank accounts under the names of his two sons to launder over HK\$10 million drug proceeds in just a year; the four bank accounts were used for temporary repository of funds, with frequent cash withdrawals or bank transfers shortly after receiving deposits. The cash flow and frequency of the transactions in the accounts were found highly incommensurate with the financial background of the two sons.

In 2012, the two sons were convicted of the offences of conspiracy to money laundering and respectively sentenced to 63 months' and 10 months' imprisonment. In 2014, Mr. G was also convicted of drug trafficking offences and sentenced to a total of 14 years and 3 months' imprisonment. In 2013 and 2014, assets valued at HK\$ 1.2 million under the control of Mr. G and his two sons were confiscated.

製毒男子及其家人清洗黑錢

案例 5 Case 5

Money Laundering by Drug Manufacturer and his Family Members







國際合作及參與 International Cooperation and Representation



對於遏止和打擊跨國清洗黑錢及恐怖分子籌資罪行,國際合作可謂最直接有效的方法之一。香港致力履行打擊清洗黑錢/反恐籌資的國際義務,分別在 1991 和 1997 年加入特別組織及亞太反洗錢組織,聯合財富情報組又於 1996 年起成為埃格蒙特組織成員。

聯合財富情報組人員活躍於國際打擊清洗黑錢/反恐籌資的領域,積極參與多方面的研討會、培訓工作坊及禮節訪談。此等機會有助促進各國交換財富情報,深入交流經驗,且涵蓋範疇甚廣,包括就2018年在本港舉行的特別組織/亞太反洗錢組織相互評核分享籌備心得。

International cooperation is one of the most direct and effective means to deter and combat transnational money laundering and terrorist financing. Committed to fulfilling global AML/CFT obligations, Hong Kong has joined the FATF and APG since 1991 and 1997 respectively, and the JFIU has been a member of the Egmont Group since 1996.

Officers of the JFIU actively engage in the global AML/CFT community through participation in a wide range of conferences, capacity building sessions and liaison visits. These opportunities promote enhanced financial intelligence exchange and in-depth experience sharing in areas including but not limited to the preparation for the joint FATF/APG ME on Hong Kong in 2018.



情報交流 INTELLIGENCE EXCHANGE

除了維持可疑交易報告機制運作之外,聯合財富情報組的另一日常要務,是與世界各地的財富情報單位保持緊密聯繫,交換財富情報。

根據香港法例,本組無須與其他財富情報單位簽訂諒解備忘錄,便可交換情報。 儘管如此,本組已應 10 個司法管轄區的財富情報單位/執法機關的要求跟它們 簽訂共 11 份諒解備忘錄或合作協議,反映本組與各地機關的策略伙伴關係,提 供法律基礎以便彼此交換情報。

本組與國際機構交換情報時,定必遵守本港披露資料作特定用途的相關法例,並符合埃格蒙特組織所發出的最新指引(如 Egmont Charter、Egmont Principles for Information Exchange 及 Operational Guidance for FIUs)。本組與世界各地的財富情報單位合作無間,在追查非法款項和交易,以及揭露有關可疑自然人或法人實益擁有權的重要資料等方面貢獻良多。

On top of the suspicious transaction reporting regime, frequent exchange of financial information with worldwide FIUs is another core business of the JFIU.

It is not required under the Laws of Hong Kong that the JFIU enters into a Memorandum of Understanding (MOU) in order to share intelligence with worldwide counterparts. That said, a total of 11 MOUs or Agreements on Cooperation have been signed between the JFIU and FIUs/ LEAs in 10 jurisdictions upon their requests for either fulfilling respective legal requirement or reflecting strategic partnership for intelligence exchange.

The JFIU adheres to relevant local legislation that delineates the specific purposes of disclosure of information and shares the common purposes outlined in the latest *Egmont Charter*, *Egmont Principles for Information Exchange* and *Operational Guidance for FIUs* when exchanging intelligence with international counterparts. The JFIU treasures the concerted efforts within the expanding FIU community to trace illicit funds and transactions, and uncover crucial data of beneficial ownership of suspicious natural or legal persons.

下表列載本組在過去四年與各地機構交換財富情報的次數(包括自發資料分享及受託個案)。從中可見,財富情報單位的龐大網絡,在堵截和調查清洗黑錢、恐怖分子籌資及相關上游罪行的工作上甚為重要。

The mounting number of JFIU's financial intelligence exchange, either spontaneous sharing of information or upon request, with our counterparts in the past four years as detailed in the below chart, reveals the paramount importance of an extensive FIU network in interdicting and tackling money laundering, terrorist financing and associated predicate crimes.

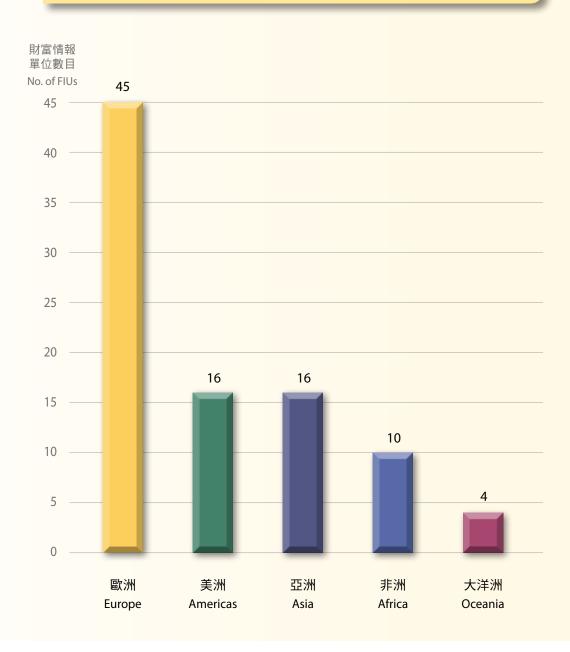
本組與各地財富情報單位的情報交流 Financial Intelligence Exchange between the JFIU and FIUs Worldwide

年度 Year		2012	2013	2014	2015
接獲外地的交換情報 書信往來次數 Total No. of Incoming Correspondences	埃格蒙特組織 (Egmont Group)	656	705	744	824
	非埃格蒙特組織 (Non-Egmont Group)	18	20	14	6
本組接獲的總數 Incoming Total		674	725	758	830
對外發出 的交換情報 書信往來次數 Total No. of Outgoing Correspondences	埃格蒙特組織 (Egmont Group)	575	613	824	944
	非埃格蒙特組織 (Non-Egmont Group)	21	18	23	200
本組發出的總數 Outgoing Total		596	631	847	1,144

回顧 2015 年,本組曾與五大洲共 90 個埃格蒙特組織成員及 1 個非埃格蒙特組織成員交換財富情報,各洲所涉財富情報單位數目如下:

In 2015, the JFIU exchanged financial intelligence with 90 Egmont Group members and 1 non-Egmont Group member across continents. The number of FIUs from each continent being engaged is shown as follows:

2015 年與本組交換情報的財富情報單位數目(按五大洲劃分) Number of FIUs Exchanged Intelligence with the JFIU (By Continents) in 2015



會議及工作坊 CONFERENCES AND WORKSHOPS

除了參與特別組織、亞太反洗錢組織及埃格蒙特組織的定期全體會議,聯合財富情報組常派代表出席各類會議,就清洗黑錢/恐怖分子籌資趨勢及籌備相互評核等事宜向其他司法管轄區借鏡。

本組亦派出一位財富情報單位/執法機關專家參與第三輪亞太反洗錢組織相互評 核工作。

Apart from regular FATF, APG and Egmont Group plenaries, representatives from the JFIU attended various meetings to gain insights from other jurisdictions into global money laundering/terriorist financing trend and ME preparatory work.

The JFIU also sent an FIU-LEA expert to participate in an assessment of the 3rd round APG ME.



2015 年 1 月,聯合財富情報組主管周志鈞與香港代表團獲邀到泰國曼谷出席聯合國 毒品和犯罪問題辦事處工作坊 — 野生動物及樹木罪行的得益追討。

Mr. Edwin CHOW, Head of JFIU, and other Hong Kong delegates were invited to the United Nations Office on Drugs and Crime (UNODC) Workshop on Recovering the Proceeds of Crime from Wildlife and Timber Crime held in Bangkok, Thailand in January 2015.



2015 年 3 月,香港警務處人員隨香港代表團在深圳出席第二屆內地暨香港澳門 反洗錢業務交流會。

The HKPF joined the Hong Kong delegation to attend the 2nd Tripartite Meeting on AML Works among the Mainland, Hong Kong and Macao in Shenzhen in March 2015.

2015 年 7 月,當時的毒品調查科高級警司 (財富調查) 馬炳堯 代表聯合財富情報組、財富調查組和風險評估小組在新西蘭奧克 蘭出席第 18 屆亞太反洗錢組織周年會議,就打擊清洗黑錢/反 恐籌資進行專題討論。

Mr. MA Ping-yiu, the then Senior Superintendent of Police (Financial Investigation) of NB, represented the JFIU, FID and RAU to discuss topical AML/CFT issues at the 18th APG Annual Meeting in Auckland, New Zealand in July 2015.



國際訪客 INTERNATIONAL VISITORS

聯合財富情報組歡迎各國合作伙伴蒞臨觀摩指導。回顧 2015 年,本組一如既往,致力拓展聯繫網絡,先後接待澳洲、內地、荷蘭、新加坡、台灣、英國及美國的代表團,深化多年來的合作關係。這類即時互動的相談機會,有助本組與來訪機構了解彼此的策略及行動目標、慣常做法和面對的挑戰,進而尋求合作機會。

The JFIU welcomes visits by international working partners. In 2015, it continues to extend its network and enhance years of work relationship by receiving delegations from Australia, the Mainland, the Netherlands, Singapore, Taiwan, the United Kingdom and the United States. Such instant and interactive discussions promote better mutual understanding of strategic and operational goals, practices and challenges; and provide an opportunity for the JFIU and visiting agencies to explore room for further cooperation.



2015年5月,新加坡警隊刑事偵查局代表與毒品調查科管理層面會。 Representatives from the Criminal Investigation Department of Singapore Police Force (SPF) met the NB management in May 2015.



2015 年 10 月,美國金融罪行執法網絡、美國國稅局以及美國國土安全調查局訪問本組。

The Financial Crimes Enforcement Network, the Internal Revenue Service and the Homeland Security Investigations from the U.S. visited the JFIU in October 2015.





聯合財富情報組着重能力培訓,並以此為長遠的策略方針,冀與一眾持份者在打擊清洗黑錢及反恐籌資的專門範疇探索求新、互相交流和傳承經驗。

本組鼓勵人員修讀不同課程,增進專業知識。外出受訓的人員可與其他人員分享新知,在工作中學以致用,提升部門效能。

本組時常為本港以至世界各地的執法機關及其他機構人員舉辦財富調查培訓課程,並協助統籌對金融機構和指定的非金融企業及行業的外展宣傳,藉此提醒公私營界別對本港打擊清洗黑錢/反恐籌資制度所肩負的重要角色,同時鼓勵各界就清洗黑錢及恐怖分子籌資的最新犯案趨勢積極討論,相互協作,主動回應。

The JFIU advocates capacity building as a long-term strategy to consolidate, exchange and retain specialized AML/CFT knowledge among various stakeholders.

The JFIU encourages its officers to strengthen their expertise through participation in different courses. The trained personnel can then share the newly acquired AML/CFT knowledge with others, and apply it at workplace to sustain corporate effectiveness.

The JFIU also endeavours to provide financial investigation training for local and worldwide LEAs and other counterparts, as well as to coordinate publicity outreach to the FIs and DNFBPs. Such educational initiatives promote renewed awareness of the important role and responsibility of both public and private sectors in the AML/CFT regime, and encourage discussion and collaboration on proactive responses to the latest money laundering and terrorist financing trends.

毒品調查科的財富調查課程 及本組的打擊清洗黑錢 / 反恐籌資研討會所涉範疇廣闊 Wide-ranging topics of NB's Financial Investigation Courses and JFIU's AML/CFT Seminars



專門訓練 SPECIALIST TRAINING

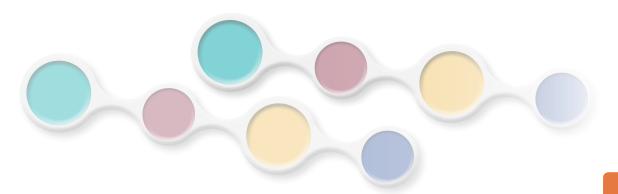
本組不時派員出席專門訓練,務求掌握打擊清洗黑錢/反恐籌資領域的最新發展, 作為參考依據,進而改善本組日常運作。

From time to time, the JFIU sends its staff members to attend specialist training sessions, with a view to enhancing their understanding of the up-to-date development in the AML/CFT field and offering valuable input to daily operation of the unit.



2015年6月29日至30日及7月2日,本組聯同香港其他機構代表,參與由世界銀行主講的「香港洗錢及恐怖分子籌資風險評估工作坊」。

The JFIU, together with other representatives from other local agencies, took part in the Hong Kong Money Laundering and Terrorist Financing Risk Assessment Workshop run by the World Bank on 29th –30th June and 2nd July 2015.



財富調查課程 FINANCIAL INVESTIGATION COURSES

由 1989 至 2015 年,共有 2,417 名香港警務處人員,以及 768 名來自 30 個司法管轄區的執法機關、財富情報單位及監管機構人員在港修讀常規的財富調查課程。

Between 1989 and 2015, a total of 2,417 HKPF officers, as well as 768 delegates of LEAs, FIUs and regulators from 30 jurisdictions attended the financial investigation courses in Hong Kong.

內部財富調查訓練 In-house Financial Investigation Training

聯合財富情報組每季均代表毒品調查科為警隊內部舉辦課程,向刑偵人員及庫務會計師講授財富調查的技巧,務求提升警隊在打擊清洗黑錢/反恐籌資方面的整體執法能力。

2015年,聯合財富情報組、財富調查組及洗錢及恐佈分子資金籌集風險評估小組(風險評估小組)特別合辦兩個工作坊,與警隊約 100 名前線刑事單位主管討論現今搜集財富情報和調查清洗黑錢及相關上游罪行所面臨的挑戰。聯合財富情報組管理層,就可疑交易報告制度一些專項議題,主動與警隊各總區及區刑事單位主管分享心得。

On behalf of the NB, the JFIU organizes quarterly in-house financial investigation courses for crime investigators and treasury accountants of the HKPF. These classes seek to increase the overall AML/CFT enforcement capability of HKPF.

In 2015, the JFIU, FID and Money Laundering and Terrorist Financing Risk Assessment Unit (RAU) co-ran two additional workshops particularly for around 100 HKPF's frontline crime managers to discuss the latest challenges in financial intelligence gathering and money laundering and associated predicate crime investigation. The JFIU management also took the initiative to conduct roadshows to share the topical issues of STR regime with heads of regional and district crime formations within the HKPF.



來自警隊不同單位的學員進行實習訓練,熱烈討論如何分析財富情報和調查清洗黑錢活動。 Trainees from different HKPF Formations actively interacted with one another during practical sessions on financial intelligence analysis and money laundering investigations.



2015 年 3 月,本組邀來律政司演講嘉賓,在刑事單位主管專題工作坊 討論法庭對清洗黑錢訴訟的最新判決,及其對財富調查有何影響。

Guest speakers from the Department of Justice were invited to the ad-hoc crime managers' workshops in March 2015 to discuss the implications of recent money laundering court judgments on financial investigations.

國際財富調查訓練

International Financial Investigation Training

聯合財富情報組每年舉辦兩項國際財富調查課程,分別以英文和中文授課,供世界各地的策略伙伴前來參與。

本組開辦的國際課程,歷年來均大獲好評。此外,本組更於 2015 年獲中華人民 共和國公安部及新加坡警隊的邀請,為其度身訂造財富調查課程。

藉此等交流機會,不同司法管轄區的人員可互相了解,參考良好實務,識別共同面對的難題,掌握跨國犯罪活動的財富情報分析及財富調查工作的最新發展。

The JFIU also hosts two annual international financial investigation courses in Hong Kong for strategic partner agencies around the world, one conducted in English and the other in Chinese.

Given the continuously positive feedback from the delegates over the years, officers of the JFIU and FID were invited to deliver tailor-made financial investigation courses for the Ministry of Public Security of the People's Republic of China (MPS) and the SPF in 2015.

All these forums facilitated learning of good practices, common challenges and latest updates in financial intelligence analysis and financial investigation against transnational criminal activities from various jurisdictions.









2015 年 10 月及 11 月,分別以英文和中文授課的國際財富調查課程,於警察總部順利舉行。

The International Financial Investigation Courses (English and Chinese) were successfully concluded at the Hong Kong Police Headquarters in October and November 2015.



各地代表分組進行模疑訓練,處理複雜的財富 調查案件,大家紛紛發表意見,交流經驗。

International delegates were eager to exchange different views and experiences when they worked in teams to handle simulated complex financial investigation cases.





各地代表參觀香港交易所及香港 金融管理局,親身了解本港健全 的金融制度。

Visits to the Hong Kong Exchanges and Clearing Limited and the Hong Kong Monetary Authority provided an opportunity for international delegates to obtain first-hand information on vigorous financial system of Hong Kong.





2015 年 11 月,毒品調查科應新加坡警隊邀請,派出聯合財富 情報組及財富調查組三名人員到新加坡舉辦為期四天的財富調查 工作坊,向逾 200 名新加坡警隊人員講授查案技巧。

Invited by the Criminal Investigation Department of SPF, three officers of the JFIU and FID NB conducted a four-day financial investigation workshop for over 200 SPF officers in Singapore in November 2015.



2015 年 12 月,毒品調查科財富調查組與公安部禁毒局在深圳合辦為期四天的涉毒資產調查業務培訓班,為禁毒局超過 100 名人員進行訓練。

The FID NB and the Narcotics Control Bureau (NCB) of MPS jointly organized a four-day training of drug-related assets investigation for over 100 NCB officers in Shenzhen, the Mainland in December 2015

反清洗黑錢 / 反恐籌資的外展宣傳 AML/CFT PUBLICITY OUTREACH

聯合財富情報組與香港特別行政區政府一向提倡以合規遵從的模式,呼籲市民留意打擊清洗黑錢及恐怖分子籌資活動的風險,並採取相應的預防措施。

本組與財經事務及庫務局和保安局禁毒處互相協作,又與其他監管機構及專業團體舉辦研討會,提高不同界別的金融機構和指定的非金融企業及行業對打擊清洗 黑錢/反恐籌資的意識。2015年,本組和財富調查組分別派員在28個研討會主講,提述可疑交易報告制度所關注議題,並分享新型的個案研究,冀能防止和偵破清洗黑錢/恐怖分子籌資活動。

本組定期編製《可疑交易報告季度分析》,內容涵蓋可疑交易報告統計數字,以及本組對呈報機構的回應,供金融機構和指定的非金融企業及行業閱覽。於 2015年出版的報告,不但講述清洗黑錢個案及財富情報分析,還響應國際對恐怖主義外來戰士的關注,就識別恐怖分子籌資活動須注意的事項及相關風險進行專題報道。

The JFIU echoes the Hong Kong Special Administrative Region Government's pro-compliance approach to appeal to the public to better understand money laundering/ terrorist financing risks and implement AML/CFT preventive measures.

The JFIU works in partnership with the FSTB and the ND, SB and joins other regulators or professional bodies to provide AML/CFT seminars for different sectors of the FIs and DNFBPs. In 2015, the JFIU and FID sent officers as guest speakers in 28 seminars to address issues arising from the STR regime and share contemporary case studies with a view to preventing and detecting money laundering/ terrorist financing activities.

The JFIU also publishes a *Quarterly STR Analysis Report (Quarterly Report)* to update FIs and DNFBPs on STR related matters such as relevant statistics and feedback to reporting entities. For the *Quarterly Reports* issued in 2015, apart from money laundering cases and financial intelligence analyses, a feature on red flags and points to note in identifying suspicious terrorist financing activities in view of the heightened global concern of foreign terrorist fighters travelling across the continents was released.



2015 年 9 月,當時的本組副主管黃耀森在研討會向法律 界講解打擊清洗黑錢/反恐籌資的專業知識。

Mr. Simon WONG, the then Deputy Head of JFIU, shared his AML/CFT expertise at a seminar for legal sector in September 2015.



本組人員獲邀到香港多個打擊清洗黑錢/反恐籌資研討會演講。

JFIU officers were invited to speak at different AML/CFT seminars in Hong Kong.





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年度交流活動概覽 Event Calendar of the Year



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在泰國曼谷出席聯合國毒品和犯罪問題辦事處工作坊 — 野生動物及樹木罪行的得益追討

The UNODC Workshop on Recovering the Proceeds of Crime from Wildlife and Timber Crime in Bangkok, Thailand

在德國柏林出席埃格蒙特組織「法律組織及金融產品課程」

The Egmont Group's Legal Entities and Financial Products Course in Berlin, Germany

在法國巴黎出席特別組織全體會議及工作小組會議

The FATF Plenary and Working Group Meetings in Paris, France

在內地深圳出席第二屆內地暨香港澳門反洗錢業務交流會

The 2nd Tripartite Meeting on AML Works among the Mainland, Hong Kong and Macao in Shenzhen, the Mainland

台灣法務部調查局訪問聯合財富情報組

Visit to the JFIU by the Ministry of Justice Investigation Bureau, Taiwan

澳洲聯邦警察訪問聯合財富情報組

Visit to the JFIU by the Australian Federal Police (AFP)



美國財政部國稅局訪問聯合財富情報組

Visit to the JFIU by the Internal Revenue Service (IRS), the U.S. Department of Treasury

在美國駐港領事館「跨境有組織罪行研討會」上進行演講

Delivery of lecture in the Transnational Organized Crime Conference held by the U.S. Consulate General

美國聯邦調查局有組織罪案部訪問聯合財富情報組

Visit to the JFIU by the Organized Crime Section of the U.S. Federal Bureau of Investigation

就亞太反洗錢組織對斯里蘭卡的相互評核與斯里蘭卡當局會面

Face-to-Face Meeting with Sri Lankan Authorities for the APG ME on Sri Lanka

荷蘭國家警察局國際合作部訪問毒品調查科

Visit to the NB by the Department of International Cooperation, the National Police of the Netherlands (NPN)

新加坡警隊刑事偵查局訪問毒品調查科

Visit to the NB by the Criminal Investigation Department of SPF

澳洲聯邦警察「充公犯罪資產專責小組」訪問聯合財富情報組

Visit to the JFIU by the Criminal Assets Confiscation Taskforce of the AFP

在巴巴多斯布里奇敦出席第23屆埃格蒙特組織全體會議

The 23rd Egmont Group Plenary in Bridgetown, Barbados

在澳洲布里斯本出席特別組織全體會議及工作小組會議

The FATF Plenary and Working Group Meetings in Brisbane, Australia

在香港出席由世界銀行主講的香港洗錢及恐怖分子籌資風險評估工作坊

The Hong Kong Money Laundering and Terrorist Financing Risk Assessment Workshop run by the World Bank

在新西蘭奧克蘭出席第 18 屆亞太反洗錢組織全體會議

The 18th APG Plenary Meeting in Auckland, New Zealand

澳洲聯邦警察訪問毒品調查科

Visit to the NB by the AFP

荷蘭國家警察局訪問毒品調查科

Visit to the NB by the NPN

第三季 3rd Quarter

美國金融罪行執法網絡、美國國稅局以及美國國土安全調查局訪問聯合財富情報組

Visit to the JFIU by the Financial Crimes Enforcement Network, the IRS and the Homeland Security Investigations from the U.S.

在法國巴黎出席特別組織全體會議及工作小組會議

The FATF Plenary and Working Group Meetings in Paris, France

英國國家打擊犯罪總署經濟罪案科、英國稅務海關總署刑事金融情報科和英國皇家檢控 署訪問聯合財富情報組

Visit to the JFIU by the Economic Crime Command of National Crime Agency, the Criminal Finances Intelligence Operations of Her Majesty's Revenue and Customs, and the Crown Prosecution Service from the U.K.

內地重慶、上海及武漢市公安局人員訪問毒品調查科

Visit to the NB by Public Security Bureau officers from Chongqing, Shanghai, Wuhan of the Mainland

在香港警察總部舉辦國際財富調查課程(英文班及中文班)

The International Financial Investigation Course (English and Chinese Classes) in Hong Kong Police Headquarters

為新加坡警隊刑事偵查局在當地舉辦財富調查課程

Delivery of Financial Investigation Course for the Criminal Investigation Department of SPF in Singapore

毒品調查科財富調查組與公安部禁毒局在內地深圳合辦涉毒資產調查業務培訓班

Co-organization of Training of Drug-related Assets Investigation by the FID NB and the NCB of MPS in Shenzhen, the Mainland

在法國巴黎出席特別組織反恐籌資全體會議

The FATF Intersessional Plenary on CFT in Paris, France

第四季 4th Quarter





常用詞彙 Glossary



Abbreviations 簡稱	English	中文	
AFP	Australian Federal Police	澳洲聯邦警察	
AML	Anti-Money Laundering	打擊清洗黑錢	
AMLO	Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) Ordinance (Cap. 615 of the Laws of Hong Kong)	《打擊洗錢及恐怖分子 資金籌集(金融機構)條例》 (香港法例第615章)	
APG 「亞太反洗錢組織」	Asia/Pacific Group on Money Laundering (www.apgml.org)	亞洲/太平洋 反清洗黑錢組織	
CFT	Combating the Financing of Terrorism	反恐籌資	
C&ED	Customs and Excise Department	香港海關	
DNFBPs	Designated Non-Financial Businesses and Professions	指定的非金融企業及行業	
DTROPO	Drug Trafficking (Recovery of Proceeds) Ordinance (Cap. 405 of the Laws of Hong Kong)	《販毒(追討得益)條例》 (香港法例第 405 章)	
Egmont Group	The Egmont Group of Financial Intelligence Units (www.egmontgroup.org)	埃格蒙特組織	
FATF 「特別組織」	Financial Action Task Force on Money Laundering (www.fatf-gafi.org)	打擊清洗黑錢財務行動 特別組織	
Fis	Financial Institutions	金融機構	
FID NB	Financial Investigation Division, Narcotics Bureau	毒品調查科財富調查組	
FIU	Financial Intelligence Unit	財富情報單位	
FSTB	Financial Services and the Treasury Bureau	財經事務及庫務局	
НКРБ	Hong Kong Police Force	香港警務處	
ICAC	Independent Commission Against Corruption	廉政公署	
IRS	Internal Revenue Service (of the U.S. Department of Treasury)	(美國財政部)國税局	
JFIU	Joint Financial Intelligence Unit (The Financial Intelligence Unit of Hong Kong)	聯合財富情報組 (香港的財富情報單位)	
LEA	Law Enforcement Agency	執法機關	
ME	Mutual Evaluation	相互評核	

Abbreviations 簡稱	English	中文	
MOU	Memorandum of Understanding	諒解備忘錄	
MPS	Ministry of Public Security of the People's Republic of China	中華人民共和國公安部	
MSO	Money Service Operator	金錢服務經營者	
NCB	Narcotics Control Bureau (of MPS)	(公安部)禁毒局	
ND, SB	Narcotics Division, Security Bureau	保安局禁毒處	
NPN	National Police of the Netherlands	荷蘭國家警察局	
osco	Organized and Serious Crimes Ordinance (Cap. 455 of the Laws of Hong Kong)	《有組織及嚴重罪行條例》 (香港法例第 455 章)	
Quarterly Reports	Quarterly STR Analysis Reports	《可疑交易報告季度分析》	
RAU 「風險評估小組 」	Money Laundering and Terrorist Financing Risk Assessment Unit	洗錢及恐怖分子資金籌集 風險評估小組	
SPF	Singapore Police Force	新加坡警隊	
STR	Suspicious Transaction Report	可疑交易報告	
STREAMS	Suspicious Transaction Report and Management System	可疑交易報告管理系統	
TCSP	Trust and Company Service Provider	信託及公司服務供應商	
UNATMO	United Nations (Anti-Terrorism Measures) Ordinance (Cap. 575 of the Laws of Hong Kong)	《聯合國(反恐怖主義措施) 條例》 (香港法例第 575 章)	
UNODC	United Nations Office on Drugs and Crime	聯合國毒品和犯罪問題辦事處	



打擊清洗黑錢· Anti-Money Laundering· 反恐籌資· Combating the Financial B報告管理系統· STREAMS· 國際合作· International Cooperation·培訓反恐籌資· Combating the Financing of Terrorism·可疑交易舉報· Suspice International Cooperation·培訓和外展· Training and the Financing of Terrorism·可疑交易舉報· Suspicious Transaction International Cooperation·培訓和外展· Training and Outreach·打擊清下 Terrorism·可疑交易舉報· Suspicious Transaction Reporting·可疑交易報展· Training and Outreach·打擊清洗黑錢· Anti-Money Laundering· 反不正認定。 Anti-Money Laundering· 反恐籌資· Combating the Financing 易報告管理系統· STREAMS· 國際合作· International Cooperation·培訓和《反恐籌資· Combating the Financing of Terrorism·可疑交易舉報· Suspicions 所有的關係。 Training and Out Financial Intelligence Unit Enancing of Transaction Reporting· Transaction Reporting·

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